

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A “EDDY GRANT”, GREENHEART MUSIC LIMITED, a United Kingdom Limited Company, and GREENHEART MUSIC LIMITED, an Antigua and Barbuda Limited Company,

Plaintiffs,

– against –

DONALD J. TRUMP and DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendants.

Civil Action No. 1:20-cv-07103-JGK

**SUPPLEMENTAL DECLARATION  
OF BRETT VAN BENTHYSSEN**

I, Brett Van Benthysen, pursuant to 28 U.S.C. §1746, declare the following:

1. I am an attorney at law duly admitted to practice before the Courts of this State and before this Court and am counsel with the firm of Reitler Kailas & Rosenblatt LLP, attorneys for plaintiffs Edmond Grant (“Grant”), Greenheart Music Limited, a United Kingdom Limited Company (“Greenheart UK”), and Greenheart Music Limited, an Antigua and Barbuda Limited Company (“Greenheart Antigua,” and together with Grant and Greenheart UK, “Plaintiffs”) in the above-captioned action against Donald J. Trump (“Trump”) and Donald J. Trump for President, Inc. (the “Campaign,” and together with Trump, “Defendants”). I submit this supplemental declaration in response to the Court’s Order dated August 9, 2024.

2. On August 15, 2024, Plaintiffs opened Case Number 1-14154331891, for a sound recording registration of “Electric Avenue.” As of the date of this declaration, the Copyright Office has confirmed that the “Claim submission [is] completed; no further action required.” Plaintiffs

have requested expedited handling of the application and expect to have the registration number available for the Court before the scheduled oral argument.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 16, 2024

*s/ Brett Van Benthysen*  
Brett Van Benthysen